

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

IN RE PORK ANTITRUST LITIGATION

No. 0:18-cv-01776-JRT-JFD

This Document Relates To:

All Actions

**STIPULATION TO AMEND ORDER ON PROPOSED  
SCHEDULE FOR MERITS EXPERT DISCOVERY, DISPOSITIVE  
MOTIONS, AND CERTAIN EVIDENTIARY ISSUES**

The undersigned parties (“Parties”) stipulate and hereby request, under Federal Rule of Civil Procedure 16(b)(4) and D. Minn. L.R. 16.3, to amend the Court’s December 1, 2022 Order on Proposed Schedule for Merits Expert Discovery, Dispositive Motions, and Certain Evidentiary Issues (Dkt. No. 1651), and extend certain deadlines for events relating to merits expert discovery and dispositive motion briefing as follows:

<b>Event Relating to Merits Expert Discovery or Dispositive Motion Briefing</b>	<b>Current Deadline</b>	<b>Proposed New Deadline</b>
Identification and Rule 26(a)(2)(B) and 26(a)(2)(C) disclosures for any Plaintiff expert who may testify at trial	June 5, 2023	June 16, 2023
Identification and Rule 26(a)(2)(B) and 26(a)(2)(C) disclosures for any Defendant affirmative and/or rebuttal expert who may testify at trial	November 30, 2023	December 11, 2023
Expert reports from Plaintiffs’ experts rebutting Defendants’ affirmative expert reports	March 10, 2024	March 21, 2024
Dispositive motions and merits expert Daubert motions	May 17, 2024	May 31, 2024
Responses to dispositive motions and merits expert Daubert motions	August 16, 2024	August 26, 2024
Replies in support of dispositive motions and merits expert Daubert motions, and motions to exclude evidence on summary judgment, if any	September 30, 2024	October 11, 2024

Good cause exists for amendment of the schedule to extend such deadlines as set forth below:

1. Plaintiffs and their respective experts are working diligently to prepare written reports pursuant to Federal Rule of Civil Procedure 26(a)(2)(B), including processing and analyzing Defendants’ voluminous structured sales data as part of damages analyses that will be disclosed in the reports.
2. One Defendant produced additional structured data on March 20 and April 18 that may be relevant to Plaintiffs’ expert disclosures, and Defendants have agreed to allow additional time for Plaintiffs’ experts to analyze the data for their forthcoming written reports.
3. The Parties have agreed to a short proposed extension of the deadline for Plaintiffs’ Rule 26(a)(2)(B) and 26(a)(2)(C) disclosures, with subsequent related deadlines relating to merits expert discovery and dispositive motion briefing being similarly extended.

4. The Parties therefore collectively request that the aforementioned deadlines relating to merits expert discovery and dispositive motion briefing be moved. The parties do not request that any remaining provisions in the Order on Proposed Schedule for Merits Expert Discovery, Dispositive Motions, and Certain Evidentiary Issues (Dkt. No. 1651) be amended.
5. This request is being made to further efficient and cooperative case management. It is not being made for the purpose of delay, and the requested extension would not delay the resolution of this matter or prejudice any party.

DATED: May 31, 2023

Respectfully submitted,

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